

# STATE OF COLORADO

Bill Owens, Governor  
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

November 8, 2004

Mr. Joseph A. Legare, Assistant Manager  
Environment and Stewardship  
U.S. Department of Energy, RFFO  
10808 Highway 93, Unit A  
Golden, CO 80403-8200

Ms. Karan North  
Environmental Manager, K-H Material Stewardship  
Kaiser-Hill Company, L.L.C.  
Rocky Flats Environmental Technology Site  
10808 Highway 93, Unit B  
Golden, CO 80403-8200

RE: Acceptance, Closure Summary Report for Closure of RCRA Unit 750.3B

Dear Mr. Legare and Ms. North:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report transmitted on September 1, 2004. The Division agrees that closure activities were to be performed under Part X-Closure of the Site's State RCRA Permit, specifically permit number CO-04-06-23-01, effective July 23, 2004. We hereby accept the Closure Summary Report for RCRA Unit 750.3B considering the following clarification.

The Division accepts your declaration that the requirements of the approved Closure Description Document have been fulfilled. However, we must clarify your application of the clean debris surface standard as stated in Section 3.0 of the report. The report indicates that contaminated cold side equipment (equipment that was not intended to be in contact with RCRA hazardous waste) was decontaminated using a debris rule treatment technology to meet the "clean debris surface" standard.

We received a clarifying e-mail on November 3, 2004, attached, stating that cold side equipment "...did not come into contact with the waste and [was] returned to the vendor for reuse." We concur that decontamination was unnecessary and that the "...inspection to verify the equipment never came into contact with the waste" was not a "clean debris surface" inspection. Any washing or spraying of the equipment, if any, following the "inspection" is irrelevant in respect to RCRA requirements.

If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,

Steven H. Gunderson  
RFCA Project Coordinator

cc: M. Aguilar, USEPA Region VIII  
D. Miller, AGO  
Administrative Record, RFETS Bldg. T-130G

S. Garcia, City of Broomfield  
K. Lavarato, K-H  
S. Nesta, K-H

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acceptance.doc

ADMIN RECORD

IA-A-002958

**From:** "Wrapp, John" <John.Wrapp@rfets.gov>  
**To:** "Ainscough, Harlen" <harlen.ainscough@state.co.us>  
**Date:** 11/3/04 8:16AM

Harlan,

As discussed verbally, the following information provides clarification regarding the Closure Summary report for 750.3b:

- \* The equipment that came into contact with the waste was characterized as low-level mixed waste and dispositioned appropriately.

- \* The equipment that did not come into contact with the waste (e.g., make-up water holding tank, water/air lines, etc.) was inspected to ensure it did not come into contact with the waste and returned to the vendor for reuse. This inspection was not considered a "clean debris surface" inspection, rather an inspection to verify the equipment never came into contact with the waste.

I believe this information clarifies your questions regarding the Closure Summary Report for 750.3b. If you have any further questions, please contact Karen Lavorato @ 303-994-1598.

Thanks,

John Wrapp

**CC:** "Lavorato, Karen" <Karen.Lavorato@rfets.gov>